

*Championing
excellence and diversity
in broadcasting*

Founded in 1983 by Jocelyn Hay CBE
Centre



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**VLV RESPONSE TO
DCMS CONSULTATION
ON
THE RENEWAL OF LOCAL TV LICENCES**

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INFORMATION ABOUT THE VLV

1. The Voice of the Listener & Viewer (VLV) is an independent, not for profit membership-based charity, free from political and sectarian affiliations. VLV supports high quality broadcasting which maintains the democratic and cultural traditions of the UK. We support the independence and integrity of the BBC and encourage work which demonstrates commitment to the principles of Public Service Broadcasting (PSB). VLV is a charitable company limited by guarantee (registered in England and Wales No 4407712 - Charity No 1152136).

INTRODUCTION

2. VLV welcomes the opportunity to respond to the government's consultation on the renewal of local TV licences.
3. VLV supports the renewal of local TV licences with some caveats. We recognise that securing an extension for the local TV multiplex licence and local TV licences is important if certainty and stability is to be maintained for the sector and its investors. VLV recognises the potentially important role local TV plays in the UK PSB ecology.
4. However, in some regards VLV considers that the local TV 'project' has not fully achieved its original ambitions, as envisaged when it was launched in 2013. The original goal was for local TV channels to provide a range of local content to better engage citizens in the area in which they live. In reality, financing these channels has been challenging and we understand that they were especially disrupted by the pandemic. The sector has now been consolidated, so that today much of it is owned by two companies and much of the content they broadcast is not local. Most local TV channels have asked Ofcom for permission to cut their local programming during the past decade. Citing one local TV service as an example, That's TV's only local programming in Hampshire, one of the areas they serve, is a 15 minute news bulletin every weekday; the remainder of the schedule comprises teleshopping, music videos and acquisitions which provide no local information on the area in which they are broadcast.
5. Another issue which is causing some concern is that TalkTV is now broadcasting on 8 channels owned by Local TV Limited in Birmingham, Bristol, Cardiff, Leeds, Liverpool, North Wales, Teeside and Tyne & Wear under a commercial partnership. This content might attract new audiences to local TV channels, it is not local content and is considered by some to be controversial because it features sitting MPs as presenters. Ofcom is considering whether this contravenes the Broadcasting Code. While TalkTV is available on Freeview 237, affording it the prominence of the local TV slot on channel 7 or 8. This is seen as inappropriate.

6. Another problem with local TV is that it is not universally available to all UK audiences – only to 15 million homes, in those areas where it is profitable to provide it – which means its public value is limited.
7. While VLV considers that the concept of local TV has its merits and some channels do support local journalism and have a strong local identity, others should deliver more value for local audiences in return for the prominent position local TV is guaranteed on the DTT EPG.
8. VLV considers that as part of this review of whether to renew the local TV licences it is important that the government reconsiders whether all local TV services as a whole continue to adequately deliver the objectives set out in local TV legislation.

Q1. Do you agree with the government's preferred approach concerning the arrangements for the renewal of the local TV multiplex licence?

9. VLV agrees with the government's preferred approach which is to require Ofcom to undertake a performance review of the multiplex, the conclusions of which will be made available to Parliament and published online; and for the multiplex provider to evidence how it plans to support local TV services and address any concerns identified by Ofcom.

Q2. Do you have any evidence you would like to contribute relating to the benefits or costs of this approach? Please consider both monetisable and non-monetisable benefits and costs; and both one-off and ongoing benefits and costs.

10.No.

Q3. Do you agree with the government's preferred approach of renewing the existing licences for local TV services, subject to the conditions outlined above?

- 11.VLV agrees with the government's preferred approach with the caveat, as mentioned above, that VLV would like the government to consider whether local TV channels are adequately delivering public value for the audiences they serve – ie an appropriate volume of genuinely local content.
- 12.We understand that the government's preferred approach is that Ofcom will undertake a performance review of the licencees, each provider will submit proposals outlining the ways in which they anticipate meeting the objectives for local TV; Ofcom will assess these proposals and approve renewal if they are satisfied that the provider will be able to maintain current levels of service delivery over the next licence period.
- 13.We oppose an automatic renewal process for all individual local services because we consider it is important for the sustainability of each service to be assessed. While we do not oppose a competitive relicensing process on principle because it could allow new entrants to the market which could

provide a better service, we understand that it could be detrimental for the sector because it will create additional uncertainty for existing licence holders.

Q4. Do you have any evidence you would like to contribute relating to the benefits or costs of this approach? Please consider both monetisable and non-monetisable benefits and costs; and both one-off and ongoing benefits and costs.

14.No.

Q5. Do you have any evidence you would like to contribute relating to the benefits or costs of other approaches? Please consider both monetisable and non-monetisable benefits and costs; and both one-off and ongoing benefits and costs.

15.No.

Q6. Do you think the local TV objectives in the Local Digital Television Programme Services Order 2012 are still fit for purpose?

16.VLV considers the local TV objectives in the Local Digital Television Programme Services Order 2012 are still appropriate, but, as stated above, we question whether local TV services are delivering the objectives effectively enough currently and also whether any local TV service will be able to effectively deliver them while remaining financially sustainable.

17.We understand the objectives are as follows:

- To meet the needs of the area or locality where it is received. This was further defined as: bringing social or economic benefits to the area or locality, or to different categories of persons living or working in that area or locality; or catering for the tastes, interests and needs of some or all of the different descriptions of persons living or working in the area or locality
- To broaden the range of television programmes available for viewing by persons living or working in that area or locality
- To increase the number and range of the programmes about that area or locality that are available for such viewing
- To increase the number of programmes made in that area or locality that would be so available.

18.While we recognise that there could be value in narrowing the objectives, to support local journalism, for example, we believe there is merit in the objectives being broad, as they currently are, which allows for a range of approaches to be taken by different operators and allows flexibility.

19.VLV considers that in return for the benefits afforded to local TV services, while DTT remains the most popular platform for viewing live TV, local TV services should be required to deliver better public value and more genuinely local content which delivers the objectives as set out in the Local Digital Television Programme Services Order 2012. If it is considered that delivering

a greater volume of local content is not financially sustainable then the government should consider whether it is sensible to renew local TV licences.

Q7. Do you have any evidence you would like to contribute relating to the benefits and/or costs of any alternative approaches (e.g. adding, amending, or removing an objective)? Please consider both monetisable and non-monetisable benefits and costs; and both one-off and ongoing benefits and costs.

20.No.

Q8. What do you see as the main opportunities facing the local TV sector over the next licence period (2025 to 2034)?

21.As was highlighted by the DCMS Select Committee in January this year, there is a significant need to support local journalism in the UK¹. 320 local newspapers closed between 2009 and 2019 as advertising revenues have declined². Consolidation in the market has led to more than two-thirds of UK local papers being owned by three publishers which has reduced costs, but also there is a risk that content is becoming less local. Today people are more likely to consume local news and information on social media platforms than through reliable journalistic sources which is increasing the spread of misinformation.

22.In this context there is an opportunity for local TV to provide an incredibly valuable service, engaging audiences with accurate, Ofcom-regulated local content and information. They could promote accountability and democratic oversight and sustain a greater sense of local community.

23.There is an opportunity here for the government to address the growing deficit of trustworthy, regulated media in the UK which engages citizens at a local level. VLV considers it may be necessary to reintroduce public funding to support the delivery of such local TV content, if high quality local journalism is to continue to be provided, however this funding should not derive from TV Licence income.

Q9. What do you see as the main risks and challenges facing the local TV sector over the next licence period (2025 to 2034)?

24.VLV considers that the main challenge for the local TV sector will be ensuring financial sustainability while delivering an adequate volume of local content. Additionally, the transition of viewing from live broadcasts on DTT to on demand viewing is likely to be challenging. If local TV is to remain viable it will need to be available on on demand platforms in future which will add to the financial burden being taken on.

¹ <https://committees.parliament.uk/committee/378/digital-culture-media-and-sport-committee/news/175585/more-support-needed-to-halt-damaging-decline-of-local-journalism-dcms-committee-warns/>

² <https://www.theguardian.com/commentisfree/2023/mar/05/the-guardian-view-on-local-journalisms-decline-bad-news-for-democracy>

Q10. There is a duty on public authorities to consider how their policies or decisions affect people with protected characteristics under the Equality Act 2010. Do you have any evidence of the equalities impacts of any proposals set out in the consultation?

25.No.

Q11. Do you have any comments that you feel the questions above did not sufficiently address?

26.No.